

Warren Norred, Texas State Bar No. 24045094
Clayton L. Everett, Texas State Bar No. 24065212
NORRED LAW, PLLC
515 E. Border Street
Arlington, Texas 76010
Telephone: (817) 704-3984
clayton@norredlaw.com
Counsel for Debtor

United States Bankruptcy Court
Northern District of Texas
Fort Worth Division

In re:
Crowley's Services, LLC
Debtor(s)

Case No. 21-41468-mxm
Chapter 11

CROWLEY'S SERVICES, LLC'S MOTION TO
ADMINISTRATIVELY CLOSE CHAPTER 11 CASE

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT ELDON B. MAHON U.S. COURTHOUSE 501 W. 10TH ST., RM. 128 FORT WORTH, TX 76102 **BEFORE CLOSE OF BUSINESS ON JULY 7, 2022**, WHICH IS AT LEAST 21 DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.

IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

Crowley's Services, LLC ("Debtor") in the above-captioned bankruptcy proceeding files this Motion to Administratively Close Chapter 11 Case. In support, the Debtor states:

1. On December 30, 2021, the Court entered an order confirming Debtor's plan of reorganization (Doc. 49).

2. The confirmed plan has been substantially consummated in accordance with 11 U.S.C. § 1101(2) and the estate has been fully administered, except for the completion of all plan payments.

3. As of the date of this motion, the Debtor has timely made its plan payments.

4. All monthly reports and payments due to the United States Trustee are current.

5. All litigation has concluded except to the extent that the Court has retained jurisdiction over certain pending matters, and the undersigned counsel states that to the best of counsel's knowledge, there are no outstanding issues that would preclude the administrative closure of this case.

6. By this motion, the Debtor seeks an order administratively closing this case, provided that such order shall not operate to close the case for purposes of 28 U.S.C. 1930, 11 U.S.C. § 362(c)(2)(A), or Fed. R. Bankr. P. 4006.

7. When all plan payments have been completed, Debtor may move to reopen this case for the purpose of obtaining a discharge and entry of a final decree.

8. Debtor's counsel has confirmed with counsel for the United States Trustee's office and Subchapter V Trustee concerning this motion. Neither party is opposed to the relief requested in this motion.

DATED: June 16, 2022.

Respectfully submitted,

NORRED LAW, PLLC

By: /s/ Clayton L. Everett
Clayton L. Everett
Texas State Bar No. 24065212
clayton@norredlaw.com
515 E. Border Street
Arlington, Texas 76010
Telephone: (817) 704-3984
Counsel for Debtor

CERTIFICATE OF CONFERENCE

I certify that on June 15, 2022, I contacted Elizabeth A. Young at the Office of the U.S. Trustee and Brad O'Dell, the Subchapter V Trustee, regarding the foregoing Motion. Neither party is opposed to the Motion.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 16th day of June 2022, a true and correct copy of the foregoing document was served upon the parties receiving notice via the Court's CM/ECF system. A copy will also be served on the Debtor's Matrix.

/s/ Clayton L. Everett
Clayton L. Everett